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March 22, 2017

**Ex Parte filed via ECFS**

Marlene Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> St., SW  
Washington, D.C. 20554

**Re: *Connect America Fund*, WC Docket No. 10-90**

Dear Ms. Dortch:

In 1997, the Public Service Commission of Wisconsin (Wisconsin PSC) designated Wisconsin Bell, Inc., d/b/a AT&T Wisconsin, an eligible telecommunications carrier (ETC) across its entire service territory. Last October, AT&T Wisconsin notified the Wisconsin PSC that it is relinquishing its ETC designation in all of its service territory *except* for census blocks (and portion of census blocks within its service territory) where AT&T accepted Connect America Fund Phase II (CAF II) support, as well as certain extremely high-cost census blocks identified by AT&T Wisconsin in its October notice (together, the “CAF II eligible areas”). AT&T Wisconsin filed detailed information with the Wisconsin PSC supporting its partial ETC relinquishment notification, including a list of the census blocks where it is retaining its ETC designation. On March 13, 2017, Wisconsin PSC issued a Final Decision finding that AT&T Wisconsin satisfied the statutory criteria for ETC relinquishment and approving its ETC relinquishment effective March 31, 2017.<sup>1</sup>

In that same decision, the Wisconsin PSC decided to treat AT&T Wisconsin’s notice of partial ETC relinquishment essentially as a request for a new ETC designation in the geographic areas it is retaining (*i.e.*, the CAF II eligible areas). According to the Wisconsin PSC, it may approve ETC designations for areas smaller than a wire center subject to Commission approval, if such Commission approval is necessary. The Wisconsin PSC found that it is in the public interest to grant AT&T Wisconsin’s request to remain an ETC for the CAF II eligible areas AT&T Wisconsin had identified. However, the Wisconsin PSC is unsure whether Commission approval is necessary. For that reason, the Wisconsin PSC directed AT&T to (1) obtain any necessary Commission approval (and provide such documentation to Wisconsin PSC staff) or (2) provide Wisconsin PSC staff with documentation from the Commission that no additional approval is necessary for AT&T Wisconsin to retain its ETC designation in CAF II-eligible census blocks.

Section 214(e)(5) establishes differing standards for determining the service areas of rural and non-rural telephone companies. For a rural telephone company, “service area” means that company’s entire study area unless and until the Commission and the states establish a different definition of service area for such company. 47 U.S.C. § 214(e)(5). The Commission adopted a rule, section 54.207, implementing this statutory provision, requiring states that propose to define a service area served by a *rural telephone company* to be other than such company’s study area to petition the Commission for approval. 47 C.F.R. § 54.207(c).

The Commission, however, has never applied this rule or that aspect of section 214(e)(5) to non-rural carriers like AT&T Wisconsin. States have never had to seek Commission approval for designating carriers as ETCs in portions of a non-rural carrier’s study area, and, in fact, the Commission has encouraged the states to establish “sufficiently small” service areas for non-rural carriers to “ensure accurate targeting of high-cost support.”<sup>2</sup>

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<sup>1</sup> See Attachment (*Request by Wisconsin Bell, Inc., d/b/a AT&T Wisconsin, to Relinquish its Status as an Eligible Telecommunications Carrier in Certain Parts of its Service Territory*, Final Decision, Docket No. 6720-TI-225 (Pub. Serv. Comm’n of Wis. March 13, 2017)). The Wisconsin PSC also found that AT&T Wisconsin’s relinquishment request covering entire wire centers occurs automatically under Wisconsin rules.

<sup>2</sup> In its 1997 *Universal Service Order*, after noting that the authority to designate carriers as ETCs in non-rural carrier service areas “is explicitly delegated to the state commissions,” the Commission nonetheless sought to

Moreover, when the Commission forbore from the section 214(e)(5) service area conformance requirement for winning bidders of the CAF II auction, it made clear that such forbearance was necessary only for service areas of rural telephone companies affiliated with price cap carriers.<sup>3</sup>

AT&T is unaware of any Commission approval necessary for AT&T Wisconsin to retain its Wisconsin PSC-awarded ETC designation in the CAF II eligible areas identified in its notice to the Wisconsin PSC. If the Commission concludes otherwise, AT&T respectfully requests that the Commission provide such approval promptly so that there can be no question that AT&T Wisconsin continues to be an ETC in the CAF II eligible areas. If the Commission agrees with AT&T that no such Commission approval is necessary, we also ask that the Commission promptly so notify AT&T and/or Wisconsin PSC staff.

Please do not hesitate to contact me with any questions.

Sincerely,  
/s/ Cathy Carpino  
Cathy Carpino

cc: Alex Minard  
Heidi Lankau

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discourage state commissions from awarding “unreasonably large” ETC service areas. *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, Report and Order, 12 FCC Rcd 8776, ¶¶ 184-85 (1997) (concluding, among other things, that ETC service areas in non-rural carrier service territories should be “sufficiently small to ensure accurate targeting of high cost support”).

<sup>3</sup> *Connect America Fund et al.*, WC Docket Nos. 10-90 et al., Report and Order and Further Notice of Proposed Rulemaking, FCC 16-64, ¶ 159 (2016). The Commission reached the same conclusion in its Mobility Fund proceedings. See, e.g., *Connect America Fund, Universal Service Reform – Mobility Fund*, WC Docket No. 10-90, WT Docket No. 10-208, Report and Order and Further Notice of Proposed Rulemaking, FCC 17-11, ¶¶ 118-22 (rel. March 7, 2017).

**ATTACHMENT**

**SERVICE DATE**  
**Mar 13, 2017**

PSC REF#: 299166

Public Service Commission of Wisconsin  
RECEIVED: 03/13/2017 10:30:00 AM

**PUBLIC SERVICE COMMISSION OF WISCONSIN**

Request by Wisconsin Bell, Inc., d/b/a AT&T Wisconsin, to Relinquish its Status as an Eligible Telecommunications Carrier in Certain Parts of its Service Territory

6720-TI-225

**FINAL DECISION**

This is the Final Decision in the investigation to determine whether to designate Wisconsin Bell, Inc., d/b/a AT&T Wisconsin (AT&T), as an Eligible Telecommunications Carrier (ETC), pursuant to 47 U.S.C. § 214(e)(2) and Wis. Admin. Code § PSC 160.13, for selected census blocks. AT&T requested to relinquish its ETC designation in all areas of its service territory except for selected census blocks. AT&T's request for ETC designation in selected census blocks is APPROVED, as conditioned by this Final Decision. The ETC relinquishment in any full wire centers will occur automatically. No hearing was required nor held in this docket. A list of parties to this docket can be found in Appendix A.

**Introduction**

Designation as an ETC makes a provider eligible to receive federal and state Universal Service Fund (USF) monies. The Commission designated AT&T, along with all other incumbent providers and a dozen competitors, as an ETC on December 23, 1997, in docket 05-TI-162. On October 27, 2016, AT&T provided notice to the Commission of its intent to relinquish its ETC designation in the entirety of many of its wire centers. ([PSC REF#: 293737.](#)) AT&T supplemented its request on December 23, 2016. ([PSC REF#: 295882.](#)) AT&T's request to relinquish its ETC status in full wire centers is authorized under Wis. Admin. Code

§ PSC 160.13(8) with no Commission action, and will become effective on March 31, 2017, the date requested by AT&T. ([PSC REF#: 293737](#) at 2.)

However, AT&T also requested to remain designated as an ETC in selected census blocks identified in its filing. (*Id.* at 1-2; Exhibits A and B.) In its filing, AT&T explained that “[t]he area in which AT&T seeks to relinquish its ETC designation . . . is the entirety of its current ETC designated area *except* for the census blocks identified in Exhibit B, attached hereto.” (*Id.* at 1-2.) The list of census blocks for which AT&T requested ETC designation is attached to this Final Decision as Appendix B. AT&T’s relinquishment request constitutes a petition for designation as an ETC in areas smaller than wire centers, and therefore requires Commission approval under Wis. Admin. Code § PSC 160.13(5)(b).

### **Findings of Fact**

1. AT&T is an incumbent local exchange carrier certified to provide telecommunications service in Wisconsin.
2. AT&T has been designated as an ETC under 47 U.S.C. § 214(e) and Wis. Admin. Code § PSC 160.13 throughout its service territory since 1997.
3. AT&T has qualified for funding under the federal Connect America Fund Phase II (CAF II) program in the census blocks listed in Appendix B.
4. The Federal Communications Commission (FCC) requires a CAF II funding recipient to be designated as an ETC in the areas in which the provider receives CAF II funding.
5. AT&T has requested designation as an ETC in the entirety of the census blocks listed in Appendix B that lie completely within its service territory boundaries. For those census

blocks that lie partly inside and partly outside AT&T's service territory boundaries, AT&T has requested to be designated as an ETC in the portion of the census block within its service territory.

6. AT&T's request states that it will relinquish its ETC status in all of its service territory except the portions of census blocks listed in Appendix B that also lie within AT&T service territory. Relinquishment of ETC status for complete wire centers is authorized under Wis. Admin. Code § PSC 160.13(8) and will take place without Commission action on March 31, 2017, the date requested by AT&T.

7. AT&T's request to be designated as an ETC in certain census blocks and portions of certain census blocks constitutes a petition for designation on a smaller than wire center basis, and therefore requires Commission approval under Wis. Admin. Code § PSC 160.13(5)(b).

8. It is reasonable and in the public interest to designate AT&T as an ETC for the purpose of receiving Lifeline and high cost support in the census blocks, or portions thereof, lying within AT&T's service territory as shown in Appendix B.

9. It is reasonable to make this ETC designation contingent on AT&T obtaining any necessary approvals from the FCC, as discussed below.

10. It is reasonable to assess costs for this docket to AT&T.

11. It is reasonable that AT&T provide to the Commission the necessary maps, shape files and other relevant information to identify AT&T's existing wire centers and the boundaries for the partial census blocks within each of the wire centers for which AT&T is retaining ETC status.

12. It is reasonable that AT&T share information and programming data and work with Commission staff on the development of a tool to facilitate ETC tracking within the AT&T wire centers and partial census block areas.

### **Conclusions of Law**

1. AT&T is a telecommunications public utility as defined in Wis. Stat. § 196.01(5)(a).
2. The Commission has authority under Wis. Stat. §§ 196.02, 196.016, and 196.218; Wis. Admin. Code ch. PSC 160; and 47 U.S.C. §§ 214 and 254 to issue this Final Decision.
3. The Commission has authority under Wis. Stat. § 196.85 and Wis. Admin. Code ch. PSC 5 to assess reasonable costs to AT&T.
4. The Commission has authority under Wis. Admin. Code § PSC 160.01(2)(b) to adopt different ETC requirements than those provided in Wis. Admin. Code ch. PSC 160.

### **Opinion**

ETC status was created by the 1996 Federal Telecommunications Act and codified in 47 U.S.C. § 214(e)(2). Under FCC regulations 47 U.S.C. § 214(e)(2) and 47 C.F.R. § 54.201(b), state commissions designate providers as ETCs. Designation as an ETC is required if a provider is to receive federal universal service funding. ETC designation is also required to receive funding from the state universal service High Rate Assistance Credit program.

The FCC has established a set of minimum criteria that all ETCs must meet, which is codified in 47 U.S.C. § 214(e)(1) and 47 C.F.R. § 54.101(a), *et seq.* State commissions have the

authority to adopt additional requirements, provided the additional requirements are “not inconsistent with the [FCC]’s rules to preserve and advance universal service.” 47 U.S.C. § 254(f). The United States Court of Appeals for the Fifth Circuit upheld a state commission’s right to impose additional conditions on ETCs in *Texas Office of Pub. Util. Counsel v. FCC*, 183 F.3d 393, 418 (5<sup>th</sup> Cir. 1999).

The 1996 Federal Telecommunications Act and FCC rules provide the framework in which a provider can be designated as an ETC. The initial FCC rules required that ETCs commit to serving the entirety of the service territory for “rural” incumbent companies, and the entirety of any wire centers served by “non-rural” incumbents. AT&T is a “non-rural” provider, and all of the wire centers it served as of 1996 are still considered “non-rural,” even those sold to smaller providers since 1996. The FCC has since granted forbearance from the service territory requirements for certain types of providers (e.g., wireless companies designated as ETCs only for the purpose of receiving Lifeline support), as well as a number of federal requirements not directly related to ETC status. However, the general federal ETC requirements remain, including deferring to states for the proper definition of a minimum service area for ETC designations.<sup>1</sup>

The Commission promulgated Wis. Admin. Code ch. PSC 160, and specifically Wis. Admin. Code § PSC 160.13, to govern ETC designations and requirements in Wisconsin. These rules establish the process for ETC designation and set forth a minimum set of requirements for providers seeking ETC designation in Wisconsin. These rules have been periodically updated, most recently in Commission docket 1-AC-236.

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<sup>1</sup> 47 U.S.C. § 214(e)(5); 47 C.F.R. § 54.207(a).

Wisconsin Admin. Code § PSC 160.13(5) defines the minimum area in which a provider can be designated as an ETC as either (1) the incumbent local exchange carrier (ILEC) service territory for rural companies or (2) the wire center for non-rural companies. Wisconsin Admin. Code § PSC 160.13(5)(b) allows the Commission to approve ETC designations for areas smaller than wire centers, subject to FCC approval if necessary.

AT&T requested to remain as a valid ETC in the census blocks listed in Appendix B. In its filing, AT&T explained that “[t]he area in which AT&T seeks to relinquish its ETC designation (the ‘relinquishment area’ or ‘covered area’) is the entirety of its current ETC designated area *except* for the census blocks identified in Exhibit B, attached hereto. The relinquishment will be effective on March 31, 2017.” ([PSC REF#: 293737](#) at 1-2.)

As AT&T explained in its supplemental filing, it has been granted considerable funding for broadband expansion as part of the CAF II program. ([PSC REF#: 295882](#).) The FCC has awarded the CAF II broadband expansion grants on a census block basis. The FCC requires recipients of these grants to be designated as ETCs in those census blocks. AT&T is seeking to relinquish ETC status in its entire service territory, except for the census blocks in which it will receive CAF II funding.

AT&T is proposing to relinquish its ETC designation in a number of wire centers that do not contain any census blocks for which it is eligible for CAF II funding. Relinquishment in those census blocks is provided for in Wis. Admin. Code § PSC 160.13(8)(a), and does not require formal Commission action. Since a number of other providers are designated as ETCs in each of those wire centers, AT&T’s request for relinquishment in any full wire centers will be

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automatically granted. That relinquishment will become effective on March 31, 2017, the date requested by AT&T.

AT&T also requested that it remain an ETC in selected census blocks, that is, in areas smaller than the wire centers the Commission approved when granting ETC status to AT&T in docket 05-TI-162. (*Designation of Eligible Telecommunications Carriers Under Part 54 of Title 47 of the Code of Federal Regulations*, Docket No. 05-TI-162 (Pub. Serv. Comm'n of Wis. Dec. 23, 1997, at 4-6.) In addition, AT&T has requested ETC designation for those portions of the census blocks listed in Appendix B that fall inside its service territory. For census blocks lying entirely inside AT&T's service territory, it is requesting designation for the entire census block. For census blocks lying partly inside and partly outside AT&T's service territory, it is requesting designation for the portion of each such census block lying inside its service territory.

The Commission finds it is reasonable and in the public interest to grant AT&T's request to remain an ETC for selected census blocks, or portions thereof as shown in Appendix B, subject to the conditions described below. AT&T has qualified to receive a significant amount of CAF II funding to be used for broadband deployment in Wisconsin. Broadband deployment is of critical importance to the selected census blocks and to the State of Wisconsin in general. As other providers are designated as ETCs in all of AT&T's wire centers, the relinquishment of portions of AT&T's wire centers which are not covered by CAF II funding is approved and will be effective March 31, 2017.

Being designated as an ETC entails certain requirements, such as providing Lifeline service in the area in which the provider is designated as an ETC. To date, both the Commission

and AT&T have identified the areas in which AT&T is providing ETC required services, such as Lifeline, based on the boundaries of AT&T's service territory. Both the Commission and AT&T will need to develop the processes and geographical information databases necessary to allow identification of eligible customers. It is important that both AT&T and the Commission databases identify the same areas. This requires that the computer mapping data, such as shape files, used by both the Commission and AT&T are consistent and correct. To this end, it is reasonable to require AT&T to work with Commission staff and provide access to information and programming data in order for Commission staff to develop a tool to facilitate ETC tracking within AT&T's wire centers and partial census blocks.

Traditionally, designation of a provider as an ETC for an area smaller than the service territory of an incumbent local exchange provider has required a redefinition of that service territory. For rural incumbents, FCC rules are clear that both state and federal approval are necessary for that redefinition. In the past, the Commission has routinely made its ETC designations contingent on FCC approval of these redefinitions. (*See*, order points one and two in the Final Decision in docket 1455-TI-102, dated September 26, 2008, [PSC REF#: 101661](#).)

It is not clear whether FCC approval will be necessary in this docket. This is a matter of federal law and FCC rules, and this Commission does not take a position on these questions. Instead, the Commission makes the designation of AT&T as an ETC on a census block basis contingent on either (1) AT&T obtaining any necessary FCC approvals and providing this documentation to Commission staff or (2) AT&T providing Commission staff documentation from the FCC that no additional approvals are required. All copies of any submissions to the

FCC shall be filed with the Commission. If the FCC fails to timely respond to AT&T's request, AT&T shall notify Commission staff of its efforts to obtain the requested information. Five business days after the Commission's receipt of AT&T's notification of a failure to respond by the FCC, AT&T shall be deemed to satisfy this condition.

The Commission determines that AT&T will be assessed all reasonable costs resulting from this investigation. The reasonable expenses incurred or to be incurred by the Commission resulting from this investigation and the future programming costs associated with identifying and tracking the areas in which AT&T remains an ETC will be assessed against and collected from AT&T in accordance with the provisions of Wis. Stat. § 196.85 and Wis. Admin. Code ch. PSC 5.

The Commission findings in this docket are only applicable to the facts of this case based on the current ETC designations in Wisconsin. Nonetheless, the Commission finds that it is prudent for Commission staff to conduct a review of the ETC landscape in Wisconsin. Commission staff shall monitor the status of other ETC relinquishment requests and begin discussions with other ETCs on the topic of partial ETC relinquishments. Commission staff should also begin the process of obtaining the necessary maps, shape files, or other relevant information from other ETCs to identify existing wire centers and the boundaries for ETCs in Wisconsin. Commission staff should report back its findings to the Commission as necessary.

### **Order**

1. AT&T is required to obtain any necessary FCC approvals for this request. AT&T will either (1) obtain any necessary FCC approvals and provide this documentation to

2. Commission staff or (2) provide Commission staff documentation from the FCC that no additional approvals are required. Copies of the submissions to the FCC made pursuant to this order point shall be filed with the Commission. Should FCC fail to timely respond to AT&T, AT&T shall notify Commission staff of its efforts to obtain the requested information. Five business days after the Commission's receipt of AT&T's notification of the failure to respond by the FCC, AT&T shall be deemed to have satisfied this condition.

3. AT&T is designated as an ETC for the entirety of the census blocks, as shown in Appendix B, that are completely inside AT&T's service territory, contingent on any necessary FCC approvals.

4. AT&T is designated as an ETC, for the portions of the census blocks, as shown in Appendix B, which are only partially inside AT&T's service territory, contingent on any necessary FCC approvals.

5. AT&T is an ETC within the meaning of 47 U.S.C. § 214(c), and is eligible to receive federal low income and high cost USF funding pursuant to 47 U.S.C. § 254. This Final Decision constitutes the Commission's certification to that effect.

6. AT&T is an ETC within the meaning of 47 U.S.C. § 214(c), and is eligible to receive state USF funding consistent with Wis. Admin. Code ch. PSC 160.

7. AT&T is directed to provide any necessary information and programming data to Commission staff to ensure that AT&T's ETC designation area can be correctly identified.

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8. AT&T is directed to work with Commission staff on the development of a tool to facilitate ETC tracking within the AT&T wire centers and partial census block areas.

9. Jurisdiction is retained.

10. This Final Decision takes effect one day after the date of service.

Dated at Madison, Wisconsin, this 10<sup>th</sup> day of March, 2017.

By the Commission:

A handwritten signature in black ink, appearing to read "Sandra J. Paske". The signature is written in a cursive, flowing style.

Sandra J. Paske  
Secretary to the Commission

SJP:KN:PRJ:pc DL:01497561

See attached Notice of Rights

PUBLIC SERVICE COMMISSION OF WISCONSIN  
610 North Whitney Way  
P.O. Box 7854  
Madison, Wisconsin 53707-7854

**NOTICE OF RIGHTS FOR REHEARING OR JUDICIAL REVIEW, THE  
TIMES ALLOWED FOR EACH, AND THE IDENTIFICATION OF THE  
PARTY TO BE NAMED AS RESPONDENT**

The following notice is served on you as part of the Commission's written decision. This general notice is for the purpose of ensuring compliance with Wis. Stat. § 227.48(2), and does not constitute a conclusion or admission that any particular party or person is necessarily aggrieved or that any particular decision or order is final or judicially reviewable.

*PETITION FOR REHEARING*

If this decision is an order following a contested case proceeding as defined in Wis. Stat. § 227.01(3), a person aggrieved by the decision has a right to petition the Commission for rehearing within 20 days of the date of service of this decision, as provided in Wis. Stat. § 227.49. The date of service is shown on the first page. If there is no date on the first page, the date of service is shown immediately above the signature line. The petition for rehearing must be filed with the Public Service Commission of Wisconsin and served on the parties. An appeal of this decision may also be taken directly to circuit court through the filing of a petition for judicial review. It is not necessary to first petition for rehearing.

*PETITION FOR JUDICIAL REVIEW*

A person aggrieved by this decision has a right to petition for judicial review as provided in Wis. Stat. § 227.53. In a contested case, the petition must be filed in circuit court and served upon the Public Service Commission of Wisconsin within 30 days of the date of service of this decision if there has been no petition for rehearing. If a timely petition for rehearing has been filed, the petition for judicial review must be filed within 30 days of the date of service of the order finally disposing of the petition for rehearing, or within 30 days after the final disposition of the petition for rehearing by operation of law pursuant to Wis. Stat. § 227.49(5), whichever is sooner. If an *untimely* petition for rehearing is filed, the 30-day period to petition for judicial review commences the date the Commission serves its original decision.<sup>2</sup> The Public Service Commission of Wisconsin must be named as respondent in the petition for judicial review.

If this decision is an order denying rehearing, a person aggrieved who wishes to appeal must seek judicial review rather than rehearing. A second petition for rehearing is not permitted.

Revised: March 27, 2013

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<sup>2</sup> See *Currier v. Wisconsin Dep't of Revenue*, 2006 WI App 12, 288 Wis. 2d 693, 709 N.W.2d 520.

APPENDIX A

This docket proceeding is not a contested case under Wis. Stat. ch. 227, therefore there are no parties as defined in Wis. Stat. § 227.01(8), to be listed or certified under Wis. Stat. § 227.47. However, the persons listed below are defined by Wis. Admin. Code § PSC 2.02(7), (10), and (12) as parties in the docket and participated therein.

Public Service Commission of Wisconsin  
(Not a party but must be served)  
610 North Whitney Way  
P.O. Box 7854  
Madison, WI 53707-7854

Wisconsin Bell, Inc., d/b/a AT&T Wisconsin  
Jim Jermain, Regional Vice President - External Affairs  
316 W Washington Ave Suite 501  
Madison, WI 53703  
Jj8571@att.com

**Appendix B**

Census Blocks for which AT&T is Receiving CAF II Funding, and in which it will be Designated as an Eligible telecommunications Carrier.

Wire Center	CLLI Code	Census Block #	Wire Center	CLLI Code	Census Block #
ALGOMA	ALGMWI11	550291006001107	LAKE GENEVA	LKGNWI01	551270010004060
ALGOMA	ALGMWI11	550291006001109	LAKE GENEVA	LKGNWI01	551270010004061
ALGOMA	ALGMWI11	550291006001110	LAKE GENEVA	LKGNWI01	551270010004062
ALGOMA	ALGMWI11	550291006002055	LAKE GENEVA	LKGNWI01	551270010004078
ALGOMA	ALGMWI11	550291006002065	LAKE GENEVA	LKGNWI01	551270010004086
ALGOMA	ALGMWI11	550291006002068	LAKE GENEVA	LKGNWI01	551270010004093
ALGOMA	ALGMWI11	550291006003061	LAKE GENEVA	LKGNWI01	551270016021014
ALGOMA	ALGMWI11	550291006003065	LAKE GENEVA	LKGNWI01	551270016021054
ALGOMA	ALGMWI11	550291006003067	LAKE GENEVA	LKGNWI01	551270016023120
ALGOMA	ALGMWI11	550291006003068	LAKE GENEVA	LKGNWI01	551270016024006
ALGOMA	ALGMWI11	550291006003069	LAKE GENEVA	LKGNWI01	551270016024101
ALGOMA	ALGMWI11	550291006003071	LAKE GENEVA	LKGNWI01	551270017011035
ALGOMA	ALGMWI11	550619601002020	LAKE GENEVA	LKGNWI01	551270017011058
ALGOMA	ALGMWI11	550619602001002	LAKE GENEVA	LKGNWI01	551270017011060
ALGOMA	ALGMWI11	550619602001003	LAKE GENEVA	LKGNWI01	551270017011068
ALGOMA	ALGMWI11	550619602001021	LAKE GENEVA	LKGNWI01	551270017011069
ALGOMA	ALGMWI11	550619602001022	LAKE GENEVA	LKGNWI01	551270017022000
ALGOMA	ALGMWI11	550619602001023	LAKE GENEVA	LKGNWI01	551270017022043
ALGOMA	ALGMWI11	550619602001024	LAKE GENEVA	LKGNWI01	551270017023002
ALGOMA	ALGMWI11	550619602001031	LAKE GENEVA	LKGNWI01	551270017023003
ALGOMA	ALGMWI11	550619602001032	LAKE GENEVA	LKGNWI01	551270017023010
ALGOMA	ALGMWI11	550619602001041	LAKE GENEVA	LKGNWI01	551270017023012
ALGOMA	ALGMWI11	550619602001046	LAKE GENEVA	LKGNWI01	551270017023013
ALGOMA	ALGMWI11	550619602001047	LAKE GENEVA	LKGNWI01	551270017023020
ALGOMA	ALGMWI11	550619602001058	MADISON	MDSNWI12	550250132005045
ALGOMA	ALGMWI11	550619602001059	MADISON	MDSNWI14	550250114013057
ALGOMA	ALGMWI11	550619602001060	MADISON	MDSNWI14	550250114013058
ALGOMA	ALGMWI11	550619602002000	MADISON	MDSNWI14	550250114013063
ALGOMA	ALGMWI11	550619602002001	MILWAUKEE1	MILWWI10	550791872001039
ALGOMA	ALGMWI11	550619602002052	MILWAUKEE1	MILWWI10	551010019001001
ALGOMA	ALGMWI11	550619602002053	MILWAUKEE1	MILWWI10	551010019001030
ALGOMA	ALGMWI11	550619602002056	MILWAUKEE3	MILWWI25	550791503013013
ALGOMA	ALGMWI11	550619602002058	MENOMONIE	MNMNWI11	550339702003001
ALGOMA	ALGMWI11	550619602002059	MENOMONIE	MNMNWI11	550339702003084
ALGOMA	ALGMWI11	550619602002060	MENOMONIE	MNMNWI11	550339702003085
ALGOMA	ALGMWI11	550619602002062	MENOMONIE	MNMNWI11	550339702003086
ALGOMA	ALGMWI11	550619602002063	MENOMONIE	MNMNWI11	550339702003087
ALGOMA	ALGMWI11	550619602002064	MENOMONIE	MNMNWI11	550339702003089
ALGOMA	ALGMWI11	550619602002065	MENOMONIE	MNMNWI11	550339702003090
ALGOMA	ALGMWI11	550619602002067	MENOMONIE	MNMNWI11	550339702003093

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ALGOMA	ALGMWI11	550619602002070		MENOMONIE	MNMNWI11	550339702003098
ALGOMA	ALGMWI11	550619602003001		MENOMONIE	MNMNWI11	550339702003103
ALGOMA	ALGMWI11	550619602003002		MENOMONIE	MNMNWI11	550339702003104
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CEDARBURG	CDBGWI15	551314501032014	MAYVILLE	MYVLWI11	550279614001071
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CEDARBURG	CDBGWI15	551314501043008	MAYVILLE	MYVLWI11	550279614001074

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CEDARBURG	CDBGWI15	551314501043009		MAYVILLE	MYVLWI11	550279614001075
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CHIPPEWA FALLS	CHFLWI11	550350003012013		NEWBURG	NWBGWI11	551314501032014

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CHIPPEWA FALLS	CHFLWI11	550350003012014		NEWBURG	NWBGWI11	551314501032016
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COLUMBUS	CLMBWI11	550279618002002		PORT WASHINGTON	PTWAWI11	550896302014004
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ELLSWORTH	ELWOWI11	550939608002024	RIVER FALLS	RVFLWI11	551091209043092
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FOND DU LAC	FDULWI01	550390418001016		STURGEON BAY	STBYWI11	550291004002160
FOND DU LAC	FDULWI01	550390418001017		STURGEON BAY	STBYWI11	550291004002161
FOND DU LAC	FDULWI01	550390418001018		STURGEON BAY	STBYWI11	550291004002163
FOND DU LAC	FDULWI01	550390419001003		STURGEON BAY	STBYWI11	550291004002165
FOND DU LAC	FDULWI01	550390419001004		STURGEON BAY	STBYWI11	550291004002178
FOND DU LAC	FDULWI01	550390419001006		STURGEON BAY	STBYWI11	550291004002182
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FOND DU LAC	FDULWI01	550390419002008		STURGEON BAY	STBYWI11	550291005001002
FOND DU LAC	FDULWI01	550390419002010		STURGEON BAY	STBYWI11	550291005001011
FOND DU LAC	FDULWI01	550390419003002		STURGEON BAY	STBYWI11	550291005001019
FOND DU LAC	FDULWI01	550390419003003		STURGEON BAY	STBYWI11	550291005001020
FOND DU LAC	FDULWI01	550390419003004		STURGEON BAY	STBYWI11	550291005001025
FOND DU LAC	FDULWI01	550390419003005		STURGEON BAY	STBYWI11	550291005001026
FOND DU LAC	FDULWI01	550390419003006		STURGEON BAY	STBYWI11	550291005002002
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FOND DU LAC	FDULWI01	550390419003009		STURGEON BAY	STBYWI11	550291005002007
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FOND DU LAC	FDULWI01	550390419003019		STURGEON BAY	STBYWI11	550291005004021
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FOND DU LAC	FDULWI01	550390419003021		STURGEON BAY	STBYWI11	550291005004029
FOND DU LAC	FDULWI01	550390419003022		STURGEON BAY	STBYWI11	550291005004031
FOND DU LAC	FDULWI01	550390419003024		STURGEON BAY	STBYWI11	550291005004032
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FOND DU LAC	FDULWI01	550390419003036		STURGEON BAY	STBYWI11	550291006002021
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FOND DU LAC	FDULWI01	550390419003050		STURGEON BAY	STBYWI11	550291006002032
FOND DU LAC	FDULWI01	550390419003058		STURGEON BAY	STBYWI11	550291006002034
FOND DU LAC	FDULWI01	550390419003059		STURGEON BAY	STBYWI11	550291006002035



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FOND DU LAC	FDULWI01	550390420002039		STURGEON BAY	STBYWI11	550291009001082
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FOND DU LAC	FDULWI01	550390420002055		STURGEON BAY	STBYWI11	550291009002003
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FOND DU LAC	FDULWI01	550390421003038		STEVENS POINT	STPTWI01	550730017003053
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FOND DU LAC	FDULWI01	550390421003056		STEVENS POINT	STPTWI01	550730017003069
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FOND DU LAC	FDULWI01	550390422001003		STEVENS POINT	STPTWI01	550979601003040
FORT ATKINSON	FTATWI11	550551006022027		STEVENS POINT	STPTWI01	550979602001000
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FORT ATKINSON	FTATWI11	550551006022037		STEVENS POINT	STPTWI01	550979602001022
FORT ATKINSON	FTATWI11	550551006022041		STEVENS POINT	STPTWI01	550979602001025
FORT ATKINSON	FTATWI11	550551006022042		STEVENS POINT	STPTWI01	550979602001029
FORT ATKINSON	FTATWI11	550551006022043		STEVENS POINT	STPTWI01	550979602001043





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FORT ATKINSON	FTATWI11	551050031001021		STEVENS POINT	STPTWI01	550979611002054
FORT ATKINSON	FTATWI11	551050032001003		STEVENS POINT	STPTWI01	550979612003044
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FORT ATKINSON	FTATWI11	551050032001007		STEVENS POINT	STPTWI01	550979612003049
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GREEN BAY	GNBYWI11	550090001001004		STEVENS POINT	STPTWI01	550979612003083
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GREEN BAY	GNBYWI11	550090001001007		STEVENS POINT	STPTWI01	550979612004009
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GREEN BAY	GNBYWI13	550090205022002		STEVENS POINT	STPTWI01	550979613002058
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GREEN BAY	GNBYWI13	550090205022022		STEVENS POINT	STPTWI01	550979613002064
GREEN BAY	GNBYWI13	550090205022032		STEVENS POINT	STPTWI01	550979613002065
GENOA CITY	GNCYWI12	551270017011060		STEVENS POINT	STPTWI01	550979613002066
GENOA CITY	GNCYWI12	551270017011068		STEVENS POINT	STPTWI01	550979613002067
GENOA CITY	GNCYWI12	551270017023009		STEVENS POINT	STPTWI01	550979613002068
GENOA CITY	GNCYWI12	551270017023010		STEVENS POINT	STPTWI01	550979613002069
GENOA CITY	GNCYWI12	551270017023019		STEVENS POINT	STPTWI01	550979613002070

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GENOA CITY	GNCYWI12	551270017023020		STEVENS POINT	STPTWI01	550979613002081
GENOA CITY	GNCYWI12	551270017023051		STEVENS POINT	STPTWI01	550979613002082
GENOA CITY	GNCYWI12	551270017023054		STEVENS POINT	STPTWI01	550979613002085
APPLETON	GNVLWI12	550870126022020		STEVENS POINT	STPTWI01	550979613002087
APPLETON	GNVLWI12	550870128001043		STEVENS POINT	STPTWI01	550979613002088
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APPLETON	GNVLWI12	550870128001052		STEVENS POINT	STPTWI01	550979613002116
APPLETON	GNVLWI12	550870128001056		RACINE1	STRTWI11	550590028001018
APPLETON	GNVLWI12	550870128001057		UNION GROVE	UNGVWI11	550590028001002
APPLETON	GNVLWI12	550870128001070		VAN DYNE	VNDNWI11	550390414002001
APPLETON	GNVLWI12	550870128001086		VAN DYNE	VNDNWI11	550390414002006
APPLETON	GNVLWI12	550870128005003		WAUPUN	WAPNWI11	550279602001005
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HUBERTUS	HBTSWI11	551314401062014		WAUPUN	WAPNWI11	550279602003003
HUBERTUS	HBTSWI11	551314401062018		WAUPUN	WAPNWI11	550279602003004
HUBERTUS	HBTSWI11	551314401062021		WAUPUN	WAPNWI11	550279602003009
HUBERTUS	HBTSWI11	551314401062024		WAUPUN	WAPNWI11	550279602003014
HUBERTUS	HBTSWI11	551314601011009		WAUPUN	WAPNWI11	550279602003015
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HUDSON	HDSNWI01	551091204004038		WAUPUN	WAPNWI11	550279602003151

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HUDSON	HDSNWI01	551091209031002	WAUPUN	WAPNWI11	550279602003161
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HUDSON	HDSNWI01	551091209042023	WAUPUN	WAPNWI11	550279604001033
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HUDSON	HDSNWI01	551091210002007	WAUPUN	WAPNWI11	550279604001074
HUDSON	HDSNWI01	551091210002022	WAUPUN	WAPNWI11	550279604001076
HOULTON	HLTNWI11	551091204002043	WAUPUN	WAPNWI11	550279604001139
HOULTON	HLTNWI11	551091204002046	WAUPUN	WAPNWI11	550279605002000
HOULTON	HLTNWI11	551091204002056	WAUPUN	WAPNWI11	550279605002001
HOULTON	HLTNWI11	551091204002058	WAUPUN	WAPNWI11	550279605002038
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